



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

Copy
Andrews, R.
Chrono file

FEB 29 2016

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-101

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION

The Honorable Israel Boekweg
Mayor of Hansen
City of Hansen
338 Main St. South
Hansen, Idaho 83334

Re: City of Hansen WWTP
NPDES Permit Number ID-002244-6

Dear Mayor Boekweg:

On July 29, 1999, the U.S. Environmental Protection Agency (EPA) issued a National Pollutant Discharge Elimination System (NPDES) permit to the City of Hansen, Idaho ("City") wastewater treatment facility ("Facility"), NPDES Permit Number ID-002244-6 ("Permit"). The Permit was administratively extended. The purpose of this letter is to notify the City of violations EPA discovered after reviewing administrative files including the Discharge Monitoring Reports (DMRs) submitted by the City, and in response to the November 5, 2015 inspection of the Facility conducted by the Idaho Department of Environmental Quality (IDEQ) on behalf of EPA. The purpose of this inspection was to determine the Facility's compliance with the requirements of the Clean Water Act (CWA) and the NPDES permit. I would like to express my appreciation for your staff's time and cooperation during the inspection.

REVIEW OF ADMINISTRATIVE FILES

EPA reviewed the DMRs from February 2011 to February 2016 and identified effluent limitation exceedances that constitute 247 violations of the CWA, 33 U.S.C. § 1251 *et seq.* A list of the violations is enclosed (Enclosure A).

On December 21, 2015, the NPDES Electronic Reporting Rule became effective. Permittees with a DMR requirement will have one year from this date to submit DMRs through NetDMR. Additional information is enclosed (Enclosure B).

NOVEMBER 2015 INSPECTION

Part II.A of the Permit specifies that the permittee must revise and update their O&M plan including the implementation of BMPs within 90 days of permit issuance.

At the time of the inspection, the inspector noted that the Operations and Management Plan (O&M) was out of date. The Facility's O&M cover sheet incorrectly stated the limits for the total, suspended solids parameter. The Facility's plan showed that the limit for the monthly average loading was 31 lb/d and the limit for the weekly loading average was 47 lb/d. Those limits were only in effect until December 31, 2010. The established limits from January 1, 2011 to the present are 7 lb/d and 19 lb/d respectively. This is a violation of Part II.A of the Permit.

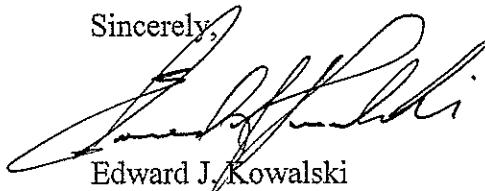
AREA OF CONCERN

At the time of the inspection, the inspector noted that neither the Quality Assurance Plan (QAP) nor the O&M showed the effective dates of the plans. While not specifically stated in the Permit, dating the updates will make it easier for the Facility and the Inspector to ensure that the plans contain the most current information available.

Although our goal is to ensure NPDES facilities comply fully with their permits, the ultimate responsibility rests with the permittee. As such, I want to strongly encourage you to continue your efforts to maintain full knowledge of the Permit requirements, and other appropriate statutes, and to take appropriate measures to ensure compliance. Notwithstanding your response to this letter, EPA retains all rights to pursue enforcement actions to address these and any other violations.

I have enclosed a copy of the inspection report (Enclosure C). If you have any questions concerning this matter, please do not hesitate to contact Raymond Andrews of my staff at (206) 553-4252.

Sincerely,



Edward J. Kowalski
Director

Enclosures

cc: Mr. Stephen Berry
Idaho Department of Environmental Quality
stephen.berry@deq.idaho.gov

Mr. Dave Anderson
Idaho Department of Environmental Quality
Twin Falls Regional Office
david.anderson@deq.idaho.gov

Mr. Jack Bennion
City of Hansen, Idaho
Wastewater Operations Manager
bennion@ch2m.com